Allen G. Kadish ARCHER & GREINER, P.C. 1211 Avenue of the Americas New York, New York 10036 Tel: (212) 682-4940

Email: akadish@archerlaw.com

-and-

Kenneth M. Florey
M. Neal Smith
ROBBINS, SCHWARTZ, NICHOLAS,
LIFTON & TAYLOR, LTD.
631 E. Boughton Road, Suite 200
Bolingbrook, Illinois 60440
Tel: (630) 929-3639
Email: kflorey@robbins-schwartz.com
nsmith@robbins-schwartz.com

-and-

Matthew T. Gensburg GENSBURG CALANDRIELLO & KANTER, P.C. 200 West Adams Street, Suite 2425 Chicago, Illinois 60606 Tel: (312) 263-2200

Email: mgensburg@gcklegal.com

Attorneys for Community Unit School District 300, Appellant

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:	) Chapter 11
SEARS HOLDINGS CORPORATION, et al.,	) Case No. 18-23538 (RDD)
Debtors.	) (Jointly Administered)
COMMUNITY UNIT SCHOOL DISTRICT 300	) ) District Court
	) Case No. 20-cv-10431 (JPC)
Appellant,	)
v. SEARS HOLDINGS CORPORATION, et al.,	)
	)
Appellees.	) }

NOTICE OF LETTER MOTION OF COMMUNITY UNIT SCHOOL DISTRICT 300 TO STAY ALL DEADLINES IN THIS BANKRUPTCY APPEAL PURSUANT TO BANKRUPTCY RULE 8018

PLEASE TAKE NOTICE that on December 4, 2020, COMMUNITY UNIT SCHOOL

DISTRICT 300 (the "School District") filed its Notice of Appeal of Order Denying the Motion

of Community Unit School District 300 to Deem Economic Development Agreement Rejected

Pursuant to the Debtors Confirmed Chapter 11 Plan, or, in the Alternative, to Compel the

Debtors to Reject the Agreement [Doc. No. 9147], with respect to the Order Denying the Motion

of Community Unit School District 300 to Deem Economic Development Agreement Rejected

Pursuant to the Debtors' Confirmed Chapter 11 Plan, or, in the Alternative, To Compel the

Debtors to Reject the Agreement [Doc. No. 9116].

PLEASE TAKE FURTHER NOTICE that on December 17, 2020, the School District

filed the Statement of Issues to be Presented and Designation or Items to be Included in the

Record on Appeal [Doc. No. 9192].

PLEASE TAKE FURTHER NOTICE that on December 21, 2020, the School District

filed the annexed Letter Motion of Community Unit School District 300 to Stay all Deadlines in

this Appeal Pursuant to Bankruptcy Rule 8018, in the United States District Court for the

Southern District of New York [Doc. No. 3 in the captioned District Court case], and provides

this Notice thereof in accordance with Local Bankruptcy Rule 8010-1.

Dated: New York, New York December 22, 2020 ARCHER & GREINER, P.C.

By: s/ Allen G. Kadish

Allen G. Kadish

1211 Avenue of the Americas

New York, New York 10036

Tel: (212) 682-4940

Email: akadish@archerlaw.com

2

-and-

Kenneth M. Florey
M. Neal Smith
Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd.
631 E. Boughton Road, Suite 200
Bolingbrook, Illinois 60440
Tel: (630) 929-3639
Email: kflorey@robbins-schwartz.com

nsmith@robbins-schwartz.com

-and-

Matthew T. Gensburg Gensburg Calandriello & Kanter, P.C. 200 West Adams Street, Suite 2425 Chicago, Illinois 60606 Tel: (312) 263-2200 Email: mgensburg@gcklegal.com

Attorneys for Community Unit School District 300, Appellant

219957066v1